EX PARTE OR LATE FILED

Squire, Sanders & Dempsey

U.S. Offices:
Cleveland, Ohio
Columbus, Ohio
Jacksonville, Florida
Miami, Florida
New York, New York
Phoenix, Arizona

International Offices:
Brussels, Belgium
Budapest, Hungary
London, England
Prague, Czech Republic

Counsellors at Law
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 20044-0407

Telephone: (202) 626-6600
Cable Squire DC
Telecopier: (202) 626-6780

July 12, 1996

Direct Dial Number

(202) 626-6634

RECEIVED

JUL 12 1996

Federal Communications Commission
Office of Secretary

William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte Presentation -- CC Docket No. 96-98

Dear Mr. Caton:

On Thursday, July 11, 1996, representatives of the Information Technology Association of America ("ITAA") made an ex parte presentation to Jane Jackson, David Konuch, David Sieradzki, Douglas L. Slotten, and Kevin Werbach of the Competitive Pricing Division of the Common Carrier Bureau. Representing ITAA were William Warner of ISSC and the undersigned of this Firm. The views expressed on behalf of ITAA are reflected in the enclosed materials.

Please let us know if you have any questions.

Sincerely,

Joseph P. Markoski

/jef
Enclosure

cc: Jane Jackson
David Konuch
David Sieradzki
Douglas L. Slotten
Kevin Werbach

0+1

IMPLEMENTATION OF THE LOCAL COMPETITION PROVISIONS IN THE TELECOMMUNICATIONS ACT OF 1996 -- CC DOCKET NO. 96-98

Ex Parte Presentation by the Information Technology Association of America

ITAA MEMBERS' INTEREST IN CC DOCKET NO. 96-98

- Major consumers of local exchange and interexchange services
- Major providers of enhanced services

CONSUMERS WILL BENEFIT FROM INTERCONNECTION RULES THAT:

- Prescribe uniform national policies
- Mandate cost-based pricing
- Require maximum unbundling without use restrictions

THE DECISIONS REACHED IN THIS PROCEEDING WILL IMPACT THE FUTURE OF THE INTERNET, OTHER ON-LINE INFORMATION SERVICES AND ACCESS CHARGE REFORM

- Use of the Internet and other on-line information services is growing
- Feature Groups are the problem, not the solution

THE COMMISSION SHOULD REQUIRE OR, AT A MINIMUM, NOT FORECLOSE THE UNBUNDLING OF THE LOCAL LOOP AND OTHER LOCAL EXCHANGE NETWORK ELEMENTS

- Enhanced service providers and other users should be able to select the network services that best meet their technical and economic needs

ITAA

- Local loops should be unbundled in a way that enables data and other traffic to be routed before it reaches the central office switch. Such unbundling would:

  - ♦ Allow interconnection at a number of established network points inside and outside the central office
  - ♦ Moot unsupported claims about the impact of the Internet and other on-line information services on LEC switches
  - ♦ Make more efficient use of LEC plant
  - ♦ Permit flat-rate pricing
  - ♦ Lower costs to consumers and service providers
  - ♦ Create new service opportunities for LECs, CLECs and IXCs
  - ♦ Improve access to the NII

- Other network elements should be unbundled so as to permit the offering of services tailored to the needs of enhanced service providers and other users with data communications needs

Loop Elements
Illustrative Example
Using Technical Standard
Interfaces for Interconnection
Issue 1

Subloop Elements
Distribution
Concentrator/Multiplexer
and Feeder

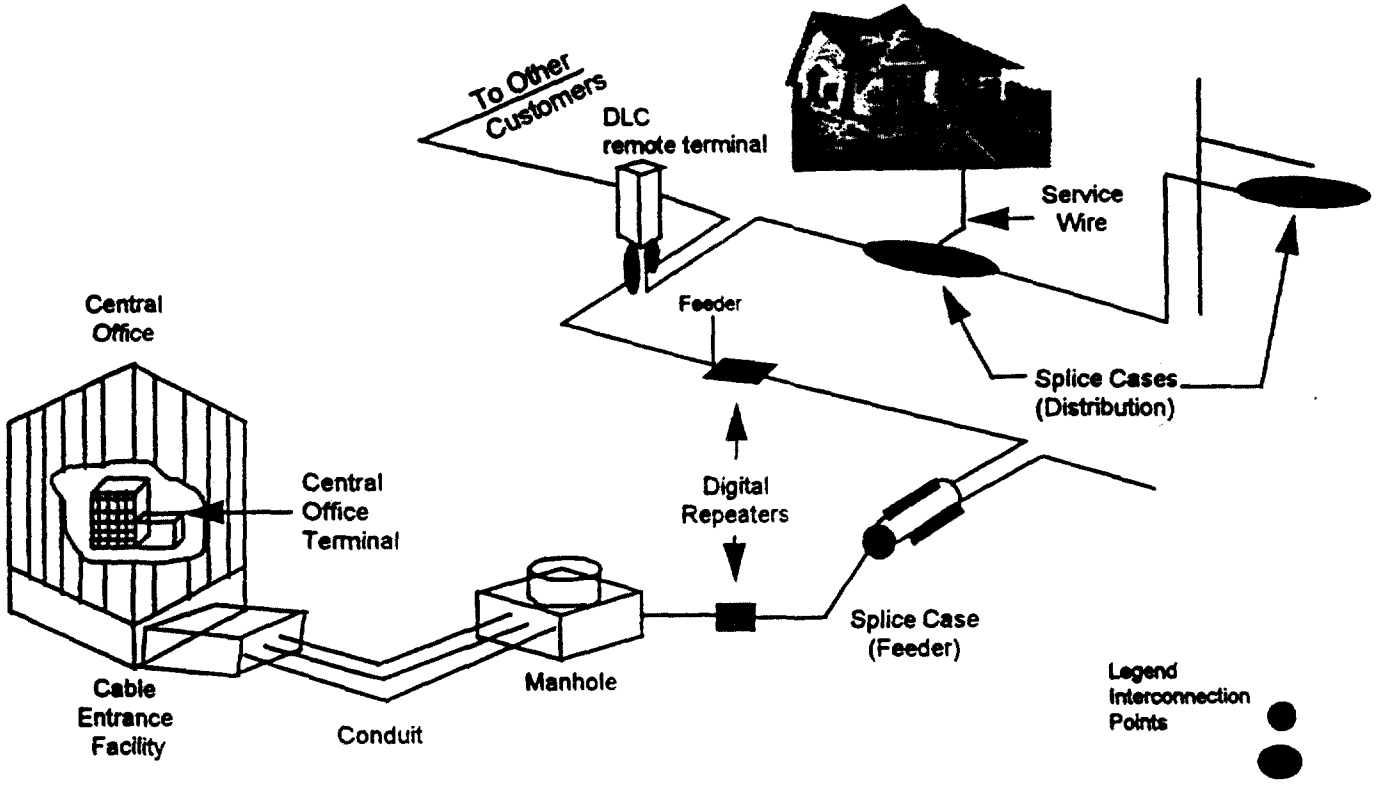

Figure 1 Central Office to the Home

Network Elements Connected via Industry Technical Standards:

- ANSI T1.403 - 1989 American Standard for Telecommunications-Carrier to Customer Installation, DS1 Metallic Interface Specification

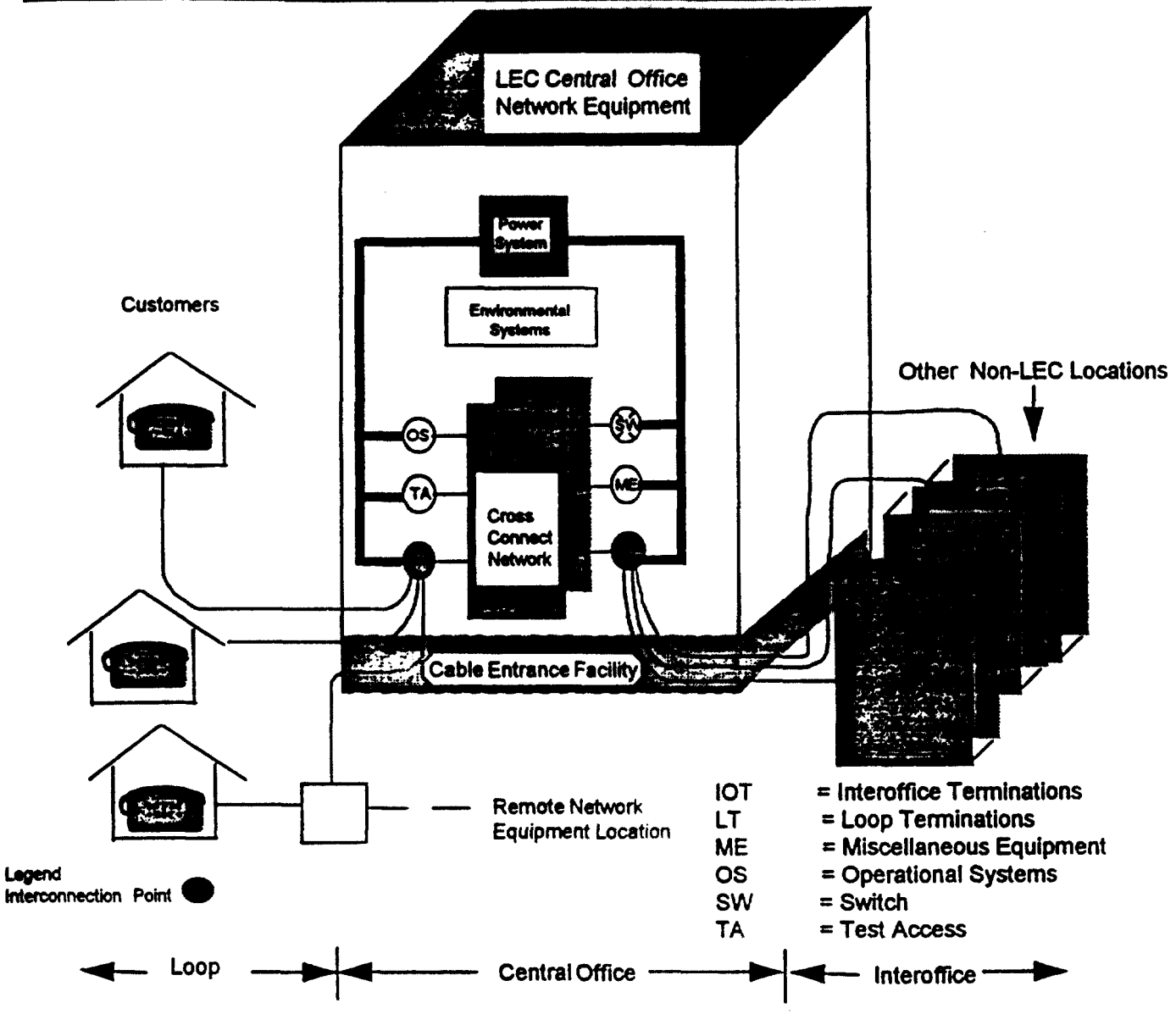

Figure 2 - End Office Switching

Network Elements Connected via Industry Technical Standards:

- ANSI T1.401.01-1994 Interface Between Carriers and Customer Installations - Analog Voice Grade Switched Access Lines Using Loop-Start and Ground-Start signaling with Line-Side Answer Supervision Feature.

WIRE CENTER EVOLUTION